

FEDERAL ELECTION COMMISSION

2013 FEB -1 PM 12:25

In the matter of:

Andrew Tobias, individually  
and in his capacity as  
Treasurer of the Democratic  
National Committee; the  
Democratic National  
Committee; and the DNC  
Services Corporation

MUR No.

06717

COMPLAINT

1. Cause of Action and its Executive Director, Daniel Epstein, bring this complaint before the Federal Election Commission ("FEC"), requesting an immediate investigation and enforcement action against Andrew Tobias, both individually and in his capacity as Treasurer of the Democratic National Committee, the Democratic National Committee and the DNC Services Corporation ("DNC Services" and collectively with the Democratic National Committee, the "DNC"), for violations of the Federal Election Campaign Act of 1971 ("FECA") as amended, 2 U.S.C. §§ 431-442, and FEC regulations thereunder.

Complainants

2. Complainant CAUSE OF ACTION is a nonprofit, nonpartisan organization that uses investigative, legal and communications tools to educate the public on how government accountability and transparency protects taxpayer interests and economic opportunity. In furtherance of its mission, Cause of Action investigates and exposes federal government corruption, waste, cronyism and fraud. These investigations fuel strategic legal efforts to restrict federal government overreach, ensure government accountability and prevent the fraudulent use of American taxpayer money.

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3. Campaign contributions are a necessary feature of political life and without private contributions to political committees, civic discourse would be impeded. The objective of campaign finance laws is to regulate the influence of money on politics. *See McConnell v. FEC*, 540 U.S. 93, 115 (2003). When federal campaign finance turns from a private civic act to public corruption, however, federal enforcement of criminal and civil sanctions is necessary. *See, e.g., McCormick v. United States*, 500 U.S. 257 (1991); *Evans v. United States*, 504 U.S. 255 (1992).

4. In order to assess whether a candidate committee, political committee or other FEC-regulated entity is in compliance with federal campaign finance law and FEC regulations, Cause of Action depends upon the availability of information contained in the mandatory receipt and disbursement reports filed by regulated entities with the FEC pursuant to FECA. 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Cause of Action is hindered in its programmatic activity when a political committee such as the DNC fails to properly disclose receipts and disbursements in the mandatory disclosure reports required by FECA.

5. Cause of Action relies on the FEC's proper administration of FECA's reporting requirements to determine if a candidate, political committee or other regulated entity is complying with FECA. The proper administration of FECA's reporting requirements includes mandating that all reports of receipts and disbursements required by FECA are properly and timely filed with the FEC. Cause of Action is hindered in its programmatic activity when the FEC fails to properly administer FECA's reporting requirements.

6. Complainant DANIEL EPSTEIN is the Executive Director of Cause of Action, a citizen of the United States and a registered voter and resident of the District of Columbia. As a registered voter, Mr. Epstein is entitled to receive information contained in reports of receipts

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and disbursements required by FECA. 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Mr. Epstein is harmed when a candidate, political committee or other regulated entity fails to report campaign finance activity as required by FECA. *See FEC v. Akins*, 524 U.S. 11, 19 (1998), *quoting Buckley v. Valeo*, 424 U.S. 1, 66-67 (1976) (holding that political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Mr. Epstein is further harmed when the FEC fails to properly administer FECA's reporting requirements, limiting his ability to review campaign finance information.

#### Respondents

7. Respondent ANDREW TOBIAS is the Treasurer of Respondent Democratic National Committee and, upon information and belief, the individual authorized to file FEC reports on its behalf and to make discretionary judgments about its compliance with FEC reporting and disclosure regulations pursuant to FECA. *See Ex. 1 (Andrew Tobias, Treasurer, Democratic National Committee, [http://www.democrats.org/about/bio/andrew\\_tobias](http://www.democrats.org/about/bio/andrew_tobias) (last visited Jan. 17, 2013))*.

8. Respondent DEMOCRATIC NATIONAL COMMITTEE is the governing body of the Democratic Party of the United States, and is an unincorporated association with its principal place of business in Washington, D.C. The principal purpose of the Democratic National Committee's organizational mission is to promote the election of Democratic political candidates at the national, state and local levels. *See Ex. 2 (Compl. at 5, Democratic National Committee v. FEC*, No. 08-1083 (D.D.C. June 24, 2008)).

9. Respondent DNC SERVICES is a nonprofit corporation registered in the District of Columbia and controlled by the elected national officers of the Democratic National Committee, with its principal place of business in Washington, D.C. DNC Services owns the

assets, employs the staff and possesses the contractual rights and obligations of the Democratic National Committee. The Democratic National Committee undertakes most of its business and financial activities through DNC Services. *See* Ex. 2, at 5.

10. Respondents Democratic National Committee and DNC Services are jointly registered with the FEC as a “national committee” within the meaning of FECA, 2 U.S.C. § 431(14), and FEC regulations, 11 C.F.R. § 100.13, and as such are required to comply with the FEC’s public reporting and disclosure requirements pursuant to FECA, 2 U.S.C. § 434.

#### Factual Allegations

11. On February 25, 2012, U.S. Department of Health and Human Services (“HHS”) Secretary Kathleen Sebelius (Secretary Sebelius) spoke at a Human Rights Campaign (“HRC”) gala in her official capacity in Charlotte, North Carolina. *See* Ex. 3 (Tim Funk, *Sebelius: No endorsement of Dalton intended at Charlotte event*, Charlotte Observer, Mar. 2, 2012, at 1). At the HRC gala, Secretary Sebelius made several statements in support of Walter Dalton’s candidacy for Governor of North Carolina and in support of Barack Obama’s candidacy for President of the United States. *Id.* The U.S. Office of Special Counsel (“OSC”) subsequently launched an investigation into Secretary Sebelius’s appearance at the HRC gala after receiving complaints that she had engaged in prohibited political activity in her official capacity. *See* Ex. 4 (Press Release, U.S. Office of Special Counsel, *OSC Concludes Hatch Act Investigation of Secretary Sebelius* (Sept. 12, 2012)).

12. On September 12, 2012, OSC wrote a letter to President Obama attaching a final report concluding that Secretary Sebelius had made several extemporaneous political remarks during her appearance at the HRC gala in violation of 5 U.S.C. § 7323(a)(1) (the “Hatch Act”). *See* Ex. 5 (U.S. Office of Special Counsel, No. HA-12-1989, Report of Prohibited Political

Activity under the Hatch Act 6-7 (2012)). The report further concluded that HHS used funds derived from the U.S. Treasury to pay for Secretary Sebelius and one of her aides to travel to and from the HRC gala, in violation of 5 U.S.C. § 7324(b), but that HHS had since reclassified the appearance from official to political and had been reimbursed for those expenses. *See id.* at 4.

13. Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, Cause of Action submitted a request to HHS, dated September 27, 2012, and obtained documents indicating that HHS spent \$1,003.69 in travel costs for Secretary Sebelius's appearance at the HRC gala and \$1,510.81 in travel costs for AJ Pearlman, the aide who accompanied her. Exs. 6 & 7 (E-mail from Kate Wolff, Dir., Scheduling and Advance, Office of the Sec'y, Dep't of Health and Human Servs., to Chris Canning *et al.* (Mar. 9, 2012, 9:35 EST) (on file with author)); (E-mail from Kate Wolff, Dir., Scheduling and Advance, Office of the Sec'y, Dep't of Health and Human Servs., to Chris Canning (July 23, 2012, 12:05 EDT) (on file with author)). HHS documents demonstrate that DNC employees consulted the Obama for America Campaign Committee to determine which organization would reimburse HHS, and that the two organizations agreed that reimbursement would come solely from the DNC. *See* Ex. 6 (E-mail from Grace Strome, Obama for Am. Campaign Comm., to Kate Wolff, Dir., Scheduling and Advance, Office of the Sec'y, Dep't of Health and Human Servs., *et al.* (Mar. 28, 2012, 10:51 EDT) (on file with author)).

14. HHS documents further reveal that on April 12, 2012, the DNC issued a check to HHS for \$1,003.69. Ex. 8 (Check No. 49707 from Democratic National Committee to "Dept of Health & Human Svcs"). Cause of Action reviewed the DNC's monthly Form 3X for the reporting period at issue, publicly available on the FEC website, and found that the DNC reported the April 12, 2012 payment to HHS on Schedule B, placing it within the category of

“Other Federal Operating Expenditures.” *See* Ex. 9 (May 20, 2012 FEC Form 3X, at 2660, Disbursement to “Dept of Health & Human Svcs”). The DNC described the purpose of the expenditure simply as “travel,” thereby avoiding any acknowledgment that the purpose of the expenditure was to reimburse the federal government for Secretary Sebelius’s Hatch Act violation. *Id.*

15. 11 C.F.R. §§ 109.10 and 104.4 require that political party committees, such as the DNC, regularly report independent expenditures on Schedule E in accordance with 11 C.F.R. § 104.3(b)(3)(viii), while 11 C.F.R. § 100.16(a) defines an “independent expenditure” as an expenditure for a communication “expressly advocating the election or defeat of a clearly identified candidate that is not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate’s authorized committee, or their agents, or a political party or its agents.” Since OSC concluded that Secretary Sebelius’s comments were extemporaneous, they were therefore *not* made in cooperation with the DNC or the candidates’ campaigns. Ex. 5, at 1. Thus, the DNC’s reimbursements of the federal government for the travel costs of Sebelius and her aide are properly classified as independent expenditures within the meaning of 11 C.F.R. § 100.16(a).

16. Cause of Action further reviewed the DNC’s monthly Form 3X dated May 20, 2012, and found that the DNC failed to report the April 12, 2012 payment to HHS on a Schedule E itemized independent expenditure report, despite this expenditure arising from a communication expressly advocating the election of Walter Dalton for Governor of North Carolina and of Barack Obama for President of the United States. In fact, the DNC has not reported any independent expenditures for the relevant reporting period. Ex. 10 (May 20, 2012 FEC Form 3X, at 4).

17. HHS documents further reveal that on or about July 23, 2012, HHS requested reimbursement from the DNC for the additional \$1,510.81 in travel costs for Secretary Sebelius's aide. Ex. 11 (E-mail from Kate Wolff, Dir., Scheduling and Advance, Office of the Sec'y, Dep't of Health and Human Servs., to Chris Canning (July 23, 2012, 12:05 EDT) (on file with author); E-mail from Chris Canning to Kate Wolff, Dir., Scheduling and Advance, Office of the Sec'y, Dep't of Health and Human Servs. (July 23, 2012, 12:12 EDT) (on file with author)).

Cause of Action reviewed the DNC's publicly available Form 3X for the monthly reporting period at issue, and found that the DNC reported the August 2, 2012 payment on Schedule B, placing it within the category of "Other Federal Operating Expenditures." See Ex. 12 (Sept. 20, 2012 FEC Form 3X, at 3027, Disbursement to "Department of Health and Human Services"). As with the April 2012 payment, the DNC described the purpose of the expenditure as "travel," thereby avoiding any acknowledgment that the purpose of the expenditure was to reimburse the federal government for Secretary Sebelius's Hatch Act violation. *Id.*

18. Cause of Action reviewed the DNC's monthly Form 3X dated September 20, 2012, and found that the DNC failed to report the August 2, 2012 payment to HHS on a Schedule E itemized independent expenditure report, despite this expenditure arising from a communication expressly advocating the election of Walter Dalton for Governor of North Carolina and of Barack Obama for President of the United States. In fact, the DNC has not reported any independent expenditures for the relevant reporting period. Ex. 13 (Sept. 20, 2012 FEC Form 3X, at 4).

19. Cause of Action reviewed the DNC's monthly Form 3X dated March 20, 2012, and the monthly Form 3X for every subsequent reporting period through September of 2012 and found that the DNC failed to report any debt or obligation to HHS on Schedule D (reserved for

debts and obligations excluding loans) for any of the relevant reporting periods. *See* Ex. 14 (Mar. 2012 through Sept. 2012 FEC Form 3X, Schedule D). Similarly, Cause of Action reviewed the DNC's monthly Form 3X dated March 20, 2012, and found that the DNC failed to report any contribution from HHS on Schedule A, the itemized receipts report, for the relevant reporting period. *See* Ex. 15 (Mar. 20, 2012 FEC Form 3X, Schedule A).

#### COUNT I

20. National political party committees, including the DNC, are required to report all contributions under Schedule A of FEC Form 3X, in accordance with 11 C.F.R. § 104.3(a)(2).

21. FEC regulations define "contribution" to include a loan, advance or "anything of value" made by any person for the purpose of influencing any election for federal office. 11 C.F.R. § 100.52(a). The regulations further define "anything of value" to include all in-kind contributions for goods or services provided without charge. 11 C.F.R. § 100.52(d)(1).

22. HHS advanced the travel costs for Secretary Sebelius and her aide to attend the HRC gala in North Carolina and was not fully reimbursed until August 2012, and thereby made a contribution of travel services to the DNC without charge in February 2012, as described by 11 C.F.R. § 100.52(a).

23. The DNC failed to report the travel services advanced by HHS in February 2012 as a contribution on Schedule A of its monthly Form 3X dated March 20, 2012, thereby violating 11 C.F.R. § 104.3(a)(2)(i).

#### COUNT II

24. 11 C.F.R. § 104.11(a) and 11 C.F.R. § 104.3(d) require that outstanding debts and other obligations owed by a political party committee such as the DNC be reported as of the date on which the debt or obligation is incurred, and shall be continuously reported until extinguished.



Such debts and obligations are to be “reported on separate schedules together with a statement explaining the circumstances and conditions under which each debt and obligation was incurred or extinguished.” 11 C.F.R. § 104.11(a).

25. OSC’s determination that Secretary Sebelius’s comments at the HRC gala violated the Hatch Act confirms that the DNC incurred a liability to HHS, as of February 25, 2012, for the cost of travel to and from the HRC gala for Secretary Sebelius and her aide.

26. As discussed above, on or about April 12, 2012, the DNC reimbursed HHS for the travel services advanced for Secretary Sebelius’s trip in February 2012, and on or about August 2, 2012, the DNC reimbursed HHS for the travel services advanced for Secretary Sebelius’s aide’s trip in February 2012. Thus, the DNC knew of its liability to pay for these expenses even before the OSC concluded its investigation in September 2012, yet failed to properly or timely amend the relevant FEC filings to reflect its obligation to reimburse HHS.

27. The DNC’s failure to report its obligation to reimburse HHS on Schedule D of Form 3X dated March 20, 2012, and its failure to report the outstanding amount of its obligation to reimburse HHS on Schedule D of Form 3X for each subsequent reporting period up until the period in which the debt was repaid in August 2012, are each separate and distinct violations of 11 C.F.R. § 104.11(a) and 11 C.F.R. § 104.3(d).

### COUNT III

28. 11 C.F.R. §§ 109.10 and 104.4 require that political party committees, such as the DNC, regularly report independent expenditures on Schedule E in accordance with 11 C.F.R. § 104.3(b)(3)(vii).

29. At the HRC gala, Secretary Sebelius made several statements in support of Walter Dalton’s candidacy for Governor of North Carolina and in support of Barack Obama’s candidacy

for President of the United States, thereby “expressly advocating the election or defeat of a clearly identified candidate for office” as described by 11 C.F.R. § 100.16(a). *See* Exs. 4 & 5.

30. 11 C.F.R. § 100.16(a) defines an “independent expenditure” as an expenditure for a communication “expressly advocating the election or defeat of a clearly identified candidate that is not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate’s authorized committee, or their agents, or a political party or its agents.”

31. OSC concluded that Secretary Sebelius’s comments were extemporaneous and therefore *not* made “in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate’s authorized committee, or their agents, or a political party or its agents.” Ex. 5, at 1. The DNC’s expenditures in support of Secretary Sebelius’s and her aide’s attendance at the February 25, 2012 HRC gala are therefore independent expenditures within the meaning of 11 C.F.R. §§ 100.16(a) and 109.1.

32. The DNC violated 11 C.F.R. § 104.3(b)(1)(vii) and 11 C.F.R. § 104.3(b)(3)(vii)(A) by failing to report the April 12, 2012 and August 2, 2012 payments to HHS on Schedule E of Form 3X for the relevant reporting periods, improperly classifying each payment as an operating expenditure and thereby avoiding the more explicit disclosure requirements for independent expenditures. Additionally, the DNC violated 11 C.F.R. § 104.3(b)(3)(vii) by failing to disclose that the expenditures were in support of particular candidates, the names of the candidates and the office sought by each and by failing to file the appropriate certification required by 11 C.F.R. § 104.3(b)(3)(vii)(B).

#### COUNT IV

33. In the alternative, should the FEC determine that the DNC properly classified the April 12, 2012 and August 2, 2012 payments to HHS under the category of “Other Federal

Operating Expenditures,” then Cause of Action alleges that the DNC nevertheless violated 11 C.F.R. § 104.3(b)(3) in that the DNC insufficiently described the purpose of each payment as a generic expenditure for “travel.” *See* Exs. 9 & 11.

34. 11 C.F.R. § 104.3(b)(3) requires that political committees describe the purpose for each itemized operating expenditure. 11 C.F.R. § 104.3(b)(3)(i)(A) defines “purpose” as “a brief statement or description of why the disbursement was made.” The FEC has further defined the level of specificity required by 11 C.F.R. § 104.3(b)(3) in a Statement of Policy entitled *“Purpose of Disbursement” Entries for Filings with the Commission*: “The ‘purpose of disbursement’ entry, when considered along with the identity of the disbursement recipient, must be sufficiently specific to make the purpose of the disbursement clear.” 72 Fed. Reg. 887 (Jan. 9, 2007).

35. In failing to adequately explain with sufficient specificity that the purpose of the April 12, 2012 and August 2, 2012 payments to HHS were to reimburse HHS for Secretary Sebelius’s violation of the Hatch Act, the DNC has thereby frustrated the public’s right to know whether such reimbursement was in fact made and has therefore violated 11 C.F.R. § 104.3(b)(3).

**CONCLUSION**

WHEREFORE, Cause of Action and Daniel Epstein request that the FEC conduct an investigation into these allegations, declare the respondents to have violated FECA and applicable FEC regulations and impose sanctions appropriate to these violations.



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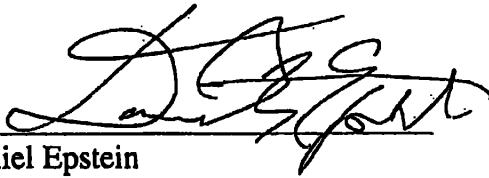
Daniel Epstein  
Executive Director  
Cause of Action  
1919 Pennsylvania Avenue N.W.  
Suite 650  
Washington, D.C. 20006  
(202) 499-4232  
(202) 330-5842

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**Verification**

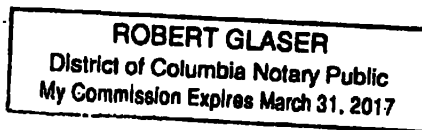
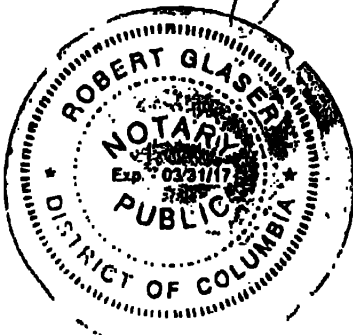
Cause of Action, through its Executive Director Daniel Epstein, hereby verifies that the statements made in the attached Complaint are, upon information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

  
Daniel Epstein

Sworn to and subscribed before me this 29<sup>th</sup> day of January, 2013.

  
Notary Public



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# EXHIBIT

1

# OUR LEADERS

## ANDREW TOBIAS

### Treasurer

DNC Treasurer since 1999, Andrew Tobias was born and raised in New York. He majored in Slavic Languages and Literature at Harvard, but spent most of his time running the million-dollar student business conglomerate and publishing "Let's Go: The Student Guide to Europe."

After graduating in 1968, he had a brief sojourn in the high-flying world of business, rising to a VP spot at then-hot/then-not National Student Marketing Corporation (about which he wrote "The Funny Money Game," his first book to gain wide national attention).

At 23, he entered Harvard Business School, writing for New York Magazine on the side and, upon graduation, as a Contributing Editor. When NYM was sold, he followed Clay Felker to Esquire. He had a column for several years in Time, and is Personal Finance Editor of Parade.

He has written three New York Times best-sellers: "Fire and Ice: the Charles Revson/Revlon Story" ("The perfect book" -- The Wall Street Journal); "The only investment guide you'll ever need" "The Only Investment Guide You'll Ever Need" ("The only investment guide many will indeed ever need." -- Barron's); and "The Invisible Bankers: Everything the Insurance Industry Never Wanted You to Know" ("Entertaining and irreverent." -- Fortune).

His coming of age memoir, "The Best Little Boy in the World," was added to the Modern Library series in September 1998 to coincide with its 25th anniversary and publication of the sequel -- "The Best Little Boy in the World Grows Up."

Andrew Tobias' "Managing Your Money," a software program he helped to create, dominated its market for several years and helped hundreds of thousands of people take control of their finances.

In the fall of 1997, he co-hosted "Beyond Wall Street," an eight-part PBS documentary.

He has received the Gerald Loeb Award for Distinguished Business and Financial Journalism, Harvard Magazine's 1998 Smith-Weld Prize, and the Consumer Federation of America Media Service Award.

He has worked actively to discourage kids from becoming smokers and to reform the auto insurance system.

His daily comments can be found at [www.andrewtobias.com](http://www.andrewtobias.com).

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# EXHIBIT

2



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

DEMOCRATIC NATIONAL COMMITTEE )

430 S. Capitol Street, S.E. )

Washington, D.C. 20003 )

Plaintiff,

v.

FEDERAL ELECTION COMMISSION )

999 E Street, N.W. )

Washington, D.C. 20463 )

Defendant. )

Case: 1:08-cv-01083

Assigned To : Bates, John D.

Assign. Date : 6/24/2008

Description: Admn. Agency Review

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

(Federal Election Campaign Act of 1971 as amended 2 USC 437g(a)(8))

**PRELIMINARY STATEMENT**

1. This is an action for declaratory and injunctive relief with respect to the continuing inability and failure of defendant Federal Election Commission ("FEC") to act on an administrative complaint filed by plaintiff Democratic National Committee ("DNC"). That complaint alleged that U.S. Senator John McCain (R-Ariz.), a candidate for the nomination of the Republican Party for President of the United States, and John McCain 2008, Inc. (the "McCain Campaign"), his principal campaign committee, have violated the Federal Election Campaign Act of 1971 as amended, 2 U.S.C. §§ 431 *et seq.* (the "FECA"), the Presidential Matching Payment Account Act, 26 U.S.C. §§ 9031 *et seq.* (the "Matching Payment Act"), and FEC regulations.

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## **PARTIES**

12. Plaintiff DEMOCRATIC NATIONAL COMMITTEE (the "DNC") is an unincorporated association, with its principal place of business in Washington, D.C. The Democratic National Committee is the governing body of the Democratic Party of the United States. The organizational purposes and functions of the DNC are to persuade and organize citizens to register to vote as Democrats and to cast their votes for Democratic Party nominees and candidates; to communicate the Democratic Party's position and messages on issues; and to aid and encourage the election of Democratic candidates at the national, state and local levels. A principal purpose of the DNC in presidential election years is nominate candidates for the President and Vice President of the United States, to promote the election of the Democratic nominees for President and Vice President, and to oppose the election of the Republican nominee.



13. DNC Services Corporation ("DNC Services") is a District of Columbia non-profit corporation that is controlled by the elected national officers of the DNC and that owns the assets, employs the staff and possesses the contractual rights and obligations of the DNC. The DNC undertakes most of its business and financial activities through DNC Services Corporation.

10. DNC and DNC Services are jointly registered with the Federal Election Commission ("FEC") as a "national committee" within the meaning of the FECA, 2 U.S.C. § 431(14) and the FEC's regulations, 11 C.F.R. § 100.13. Contributions made to the DNC of any kind are legally treated as contributions to this federal political committee. All contributions to the DNC are publicly reported and disclosed on reports filed regularly with the FEC under FECA, 2 U.S.C. § 434.

# EXHIBIT

3

# Sebelius: No endorsement of Dalton intended at Charlotte event

 Recommend  5 people recommend this.

By Tim Funk  
tfunk@charlotteobserver.com

Posted: Friday, Mar. 02, 2012

Kathleen Sebelius, President Barack Obama's secretary of Health and Human Services, is walking back what appeared to be an endorsement of Lt. Gov. Walter Dalton for N.C. governor during a speech last Saturday night in Charlotte.

## MORE INFORMATION

- Sebelius: No endorsement of Dalton intended at Charlotte event
- Sebelius: No endorsement of Dalton intended at Charlotte event

And because her policy speech at the Human Rights Campaign gala included "political components," the federal government will not pay for Sebelius' trip to Charlotte, an HHS spokesperson said in response to questions from the Observer.

On Saturday, Sebelius started her speech to about 1,400 people at the gay-rights fundraiser in the Charlotte Convention Center by acknowledging state and local politicians in attendance, including U.S. Sen. Kay Hagan, D-N.C., and Charlotte Mayor Anthony Foxx.

She also mentioned Dalton, saying "Your lieutenant governor, Walter Dalton, who needs to be the next governor of North Carolina, is in the house."

Because Dalton has five Democratic primary opponents – including former U.S. Rep. Bob Etheridge and state Rep. Bill Faison – Sebelius' comments made some political observers wonder whether the Obama administration was signaling that it has a favorite in the race.

But a statement from an HHS spokesperson to the Observer made it clear that Sebelius did not mean to endorse Dalton in the primary.

"Outside of her planned policy remarks, she made some informal acknowledgements and comments and no endorsement was intended," said the HHS spokesperson.

Sebelius' comments also got some notice in Washington. One party official, familiar with what happened, accused Dalton of misleading Sebelius during a backstage meeting by presenting himself as the only Democratic candidate in the race.

"It was a bush-league move," said the party official, who asked not to be identified. "It was a clear lie of omission . . . and it left a bad taste in the mouth of party leaders in Washington."

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Dalton spokesman Pearse Edwards acknowledged that Dalton met briefly with Sebelius before her speech, but "we did not have any prior knowledge that she was going to acknowledge his campaign for governor," he said.

Asked about the party official's charge, Edwards added: "That claim is ridiculous and false. We didn't request an endorsement and we didn't characterize our campaign in that manner."

Dalton did send out a Tweet this week, saying "Very thankful for Sec. Kathleen Sebelius' kind words about our campaign at this weekend's HRC Gala in Charlotte."

Sebelius was unavailable immediately after her Saturday speech, so it was unclear whether she meant to endorse Dalton or whether she was just unaware that he has primary opponents.

During her 14-minute speech, Sebelius listed what the Obama administration – her department and others – had accomplished on issues especially important to the gay and lesbian community.

She also said it is "hugely important" to not only re-elect Obama in November but also to defeat the proposed North Carolina constitutional amendment limiting marriage to a man and a woman.

Sebelius said a host of Obama-initiated advances for the gay community – including repeal of "Don't Ask, Don't Tell" in the military – could be "wiped out in a heartbeat" if the Republican presidential nominee wins this year.

Some said afterwards that the speech seemed more about politics than government.

Asked about that, the HHS spokesperson also said this in the statement: "The secretary attended the Human Rights Campaign dinner in Charlotte to highlight the work of the U.S. Department of Health & Human Services on LGBT issues. The trip included political components, and so the federal government will not be paying for it."

Funk: 704-358-5703

Funk: 704-358-5703

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# EXHIBIT

4



U.S. Office of Special Counsel  
1730 M Street, N.W., Suite 218  
Washington, D.C. 20036-4505

## OSC Concludes Hatch Act Investigation of Secretary Sebelius

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**FOR IMMEDIATE RELEASE**

**CONTACT: Ann O'Hanlon, (202) 254-3631; [aohanlon@osc.gov](mailto:aohanlon@osc.gov)**

WASHINGTON, D.C./September 12, 2012 –

The Office of Special Counsel (OSC) sent findings to the President today from its investigation of complaints of prohibited political activity by Secretary of Health and Human Services Kathleen Sebelius. OSC concluded that Secretary Sebelius violated the Hatch Act when she made extemporaneous partisan remarks in a speech delivered in her official capacity on February 25, 2012. The Hatch Act prohibits federal employees from using their official authority or influence to affect the outcome of an election. A federal employee is permitted to make partisan remarks when speaking in their personal capacity, but not when using their official title or when speaking about agency business.

After the event, the Department of Health and Human Services (HHS) reclassified the trip from official to political and issued a statement to that effect. The Democratic National Committee reimbursed the U.S. Treasury for all costs and expenses associated with her travel to the event. OSC found no evidence that Secretary Sebelius made any other political statements in her official capacity.

The concluding step in OSC's investigation of a Hatch Act violation by an official who is appointed by the President and confirmed by the Senate (PAS) is to send the investigative report to the President, together with a response by the employee. The report and response are available on OSC's website, <http://www.osc.gov>.

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*The U.S. Office of Special Counsel (OSC) is an independent federal investigative and prosecutorial agency. Our basic authorities come from four federal statutes: the Civil Service Reform Act, the Whistleblower Protection Act, the Hatch Act, and the Uniformed Services Employment & Reemployment Rights Act (USERRA). OSC's primary mission is to safeguard the merit system by protecting federal employees and applicants from prohibited personnel practices, especially reprisal for whistleblowing. For more information, please visit our website at [www.osc.gov](http://www.osc.gov).*

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# EXHIBIT

5





**U.S. OFFICE OF SPECIAL COUNSEL**  
1730 M Street, N.W., Suite 300  
Washington, D.C. 20036-4505

The Special Counsel

September 12, 2012

The President  
The White House  
Washington, DC 20500

Re: OSC File No. HA-12-1989

Dear Mr. President,

I am forwarding to you the findings from the U.S. Office of Special Counsel's investigation of complaints of prohibited political activity by Secretary of Health and Human Services Kathleen Sebelius. As explained in the accompanying report, OSC concluded that Secretary Sebelius violated the Hatch Act by making extemporaneous political remarks in a speech delivered in her official capacity on February 25, 2012.

The Hatch Act prohibits federal employees from using their official authority or influence to affect the outcome of an election. A federal employee is permitted to make partisan remarks when speaking in their personal capacity, but not when using an official title or when speaking about agency business.

Secretary Sebelius and the Department of Health and Human Services (HHS) reimbursed the U.S. Government for all costs and expenses associated with her travel to the February 25, 2012 event. HHS subsequently reclassified the trip from official to political and issued a statement to that effect. OSC found no evidence that Secretary Sebelius made any other political statements in her official capacity.

As the upcoming elections approach, this report offers an opportunity to remind federal employees of the complex Hatch Act restrictions. Accordingly, I submit to you the enclosed report, together with Secretary Sebelius' response.

Sincerely,

A handwritten signature in cursive script, reading "Carolyn Lerner".

Carolyn N. Lerner  
Special Counsel

Enclosures

14044353150



**U.S. OFFICE OF SPECIAL COUNSEL**

**Memorandum**

**U.S. Office of Special Counsel**

**Report of Prohibited Political Activity under the Hatch Act  
OSC File No. HA-12-1989 (Kathleen G. Sebelius)**

**August 23, 2012**

**This report represents the deliberative attorney work product of the Office of Special Counsel and is considered privileged and confidential. Any release of information beyond persons specifically designated by the Office of Special Counsel to have access to its contents is prohibited. All FOIA inquiries regarding this report should be referred to Kenneth Hendricks, at (202) 254-3600.**

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## INTRODUCTION

This report contains the investigative findings in OSC File Number HA-12-1989, two complaints of prohibited political activity received by the U.S. Office of Special Counsel (OSC). The complainants alleged that the Secretary of the Department of Health and Human Services (HHS), Ms. Kathleen G. Sebelius, violated the Hatch Act by using her official authority or influence to affect the outcome of an election when she delivered the keynote speech at the Human Rights Campaign Gala in North Carolina on February 25, 2012. Upon receipt of the complaints, OSC investigated whether Secretary Sebelius engaged in the alleged activity in violation of 5 U.S.C. § 7323(a)(1).

In addition, this case presented the issue of whether the U.S. Treasury paid for the costs of her political activity, which would have been a violation of 5 U.S.C. § 7324(b). While the Hatch Act prohibits most employees from engaging in political activity while on duty, the Act does not prohibit certain employees appointed by the President, by and with the advice and consent of the Senate, such as Secretary Sebelius, from doing so. 5 U.S.C. § 7324(b). However, they must do so in their personal capacities and the costs associated with their political activity must not be paid with money derived from the United States Treasury. 5 U.S.C. § 7324(b). As discussed below, HHS sought and received reimbursement from the appropriate political entities for the travel-related costs of the Secretary's appearance at the Human Rights Campaign Gala. Accordingly, that issue has been resolved and will not be analyzed in this report.

### I. INVESTIGATION BACKGROUND

On March 7, 2012, OSC received a complaint concerning Secretary Sebelius and a possible violation of the Hatch Act. OSC received a second complaint on March 15, 2012, alleging the same violation. After receiving the complaints, OSC conducted an investigation into the allegations that Secretary Sebelius engaged in prohibited political activity. OSC interviewed five individuals as well as Secretary Sebelius and reviewed documentary evidence, including a DVD recording of the Secretary delivering her speech at the February 25, 2012, Human Rights Campaign Gala.

### II. FACTUAL FINDINGS

Kathleen G. Sebelius (the "Secretary") is the Secretary of HHS, a federal agency within the executive branch. She was appointed by the President, confirmed by the Senate, and sworn into office on April 8, 2009.

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*A. Secretary Sebelius was Invited, in her Official Capacity as HHS Secretary, to be the Guest of Honor and Keynote Speaker at the February 25, 2012, Human Rights Campaign Gala*

The Human Rights Campaign (HRC) is a private, nonprofit civil rights organization that works to achieve equality for lesbian, gay, bisexual, and transgender (LGBT) Americans.<sup>1</sup> Every year HRC holds several gala events. This year, HRC invited Secretary Sebelius to speak at its gala in Charlotte, North Carolina. HHS considered the Secretary's appearance at the HRC gala to be in her official capacity. Secretary Sebelius' calendar and a briefing memo prepared by her staff identified the event as official. In addition, online invitations to the event referred to her as "Secretary Kathieen Sebelius" and "Secretary of DHHS Kathleen Sebelius."

*B. The Secretary's Remarks at the HRC Gala Advocated the Reelection of President Obama and the Election of Lt. Governor Dalton*

Prior to the HRC gala, the Secretary received a briefing memo. The briefing memo provided background on the event. The memo recommended ways to respond to certain questions and suggested that if asked about her personal views, she respond by stating, "I'm here to represent the President and the Obama Administration, not in my personal capacity." The briefing memo also contained eight pages of a speech outline, which was later displayed on multiple teleprompter screens while the Secretary delivered her speech.

The Secretary began her speech by acknowledging several individuals in attendance, including the president of HRC and Senator Kay Hagan. She recognized Mayor Anthony Foxx and noted that he is the host mayor of this year's Democratic National Convention. In addition, she recognized North Carolina Lieutenant Governor Walter Dalton. She said he "needs to be the next Governor of North Carolina."

Secretary Sebelius then presented her prepared remarks, which focused on the administration's policies. She referred to the President's then-recent State of the Union address and his framework for the economy. The Secretary highlighted advances made by the Obama Administration that benefitted LGBT Americans. For example, the Secretary spoke about job growth, the repeal of Don't Ask Don't Tell, support for the Respect for Marriage Act, and the Administration's decision to no longer support the Defense of Marriage Act.

The Secretary spoke specifically about her work at HHS. She discussed the passage of the Affordable Care Act and emphasized its gains for LGBT Americans. She also noted what HHS and the Administration had accomplished for the LGBT community through administrative actions, such as changes to hospital visitation rules. The Secretary told attendees that these actions were just a glimpse of what was happening across cabinet agencies.

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<sup>1</sup> See [www.hrc.org/the-hrc-story/about-us](http://www.hrc.org/the-hrc-story/about-us).

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The Secretary's description of the Administration's work was permissible under the Hatch Act. However, in addition to delivering these comments, the Secretary departed from her prepared outline when she said the following:

This Administration is committed to keep working with you but I have to tell you, we have just begun, and a lot of what I have just explained could be wiped out in a heartbeat. So as Joe<sup>2</sup> just said, *one of the imperatives is to make sure that we not only come together here in Charlotte to present the nomination to the President, but we make sure that in November he continues to be President for another four years* because this effort has just begun. I know there is an important election in early May here in North Carolina and I think that it's a great template to do what needs to be done to organize people and turn out people for November. North Carolina is hugely important in this next election, it's hugely important to defeat Amendment One on the ballot in May and *it's hugely important to make sure that we reelect the President and elect a Democratic governor here in North Carolina . . . .* (emphasis added). See Exhibit 1.

*C. After the Secretary Made Partisan Remarks During Her Keynote Speech, HHS Reclassified the HRC Event as Political*

Two days after Secretary Sebelius' keynote speech at the HRC gala, HHS started receiving media inquiries about the Secretary's comments and her attendance at the event. For example, reporters wanted to know if the Secretary intended to endorse Lt. Governor Dalton in the North Carolina Democratic primary and who paid for the Secretary's travel expenses to the gala. Because of the political nature of the Secretary's comments at the HRC gala, HHS retroactively reclassified the event as political and issued the following statement:

The Secretary attended the Human Rights Campaign dinner in Charlotte to highlight the work of the U.S. Department of Health & Human Services on LGBT issues. The trip included political components, and no the federal government will not be paying for it.

In addition, HHS sought reimbursement from the Obama for America campaign and the Democratic National Committee (DNC) for the costs of the Secretary's travel to Charlotte for the HRC event. The DNC reimbursed HHS for those costs. Further, on July 18, 2012, OSC advised HHS that there were some additional costs associated with Secretary Sebelius' attendance at the HRC gala that needed to be reimbursed to the U.S. Treasury. HHS sought and received reimbursement for those costs.

<sup>2</sup> Joe Solmonese was the president of HRC and introduced Secretary Sebelius at the gala.

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*D. Secretary Sebelius' Testimony About Her Remarks at the HRC Event*

On July 9, 2012, OSC interviewed Secretary Sebelius about the HRC gala. The Secretary told OSC that she was invited to the event to speak about the efforts of the Administration and HHS to advance LGBT issues. The Secretary explained that she did not know Mr. Dalton and did not intend to endorse his candidacy. She intended to recognize his presence, as she usually attempts to acknowledge key attendees when she is at events. The Secretary had been told that Mr. Dalton was in attendance, and he had declared his candidacy for Governor. Secretary Sebelius explained that her "shout out" came across "as an endorsement." She expressed regret for the statements, particularly since there were "other primary opponents who were close by." She further stated that she rescinded the endorsement.

With respect to her statements advocating the reelection of President Obama, Secretary Sebelius explained that this was another instance in which she "went off script." She attributed her references to President Obama's reelection to "a mistake." She stated that she "got a little caught up in the notion that the gains which had been made would clearly not continue without the President's reelection." The Secretary stated:

I've been a candidate a number of times, but I have had a number of discussions with people about how to talk about health reform and if I'm talking about our work . . . If I'm at an official event, without saying that we need to continue on . . . how to do that without violating the Hatch Act and I think I have a lot greater clarity now about what can be. I can talk about the work continuing, but not necessarily about the Administration continuing. I can talk about the law being implemented but not about the person, but I would say that this was not a great way to express what I had intended to do which is that the work needed to go on.

Secretary Sebelius admitted her error, stating "I . . . regret the fact that I clearly made a mistake. I was not intending to use an official capacity to do a political event. I think it veered into political space at an official event and I regret that it occurred."

OSC found no evidence that Secretary Sebelius had previously made political statements while promoting the work of the Administration in her official capacity and OSC is unaware of any subsequent political statements in an official setting.

*E. Secretary Sebelius had Knowledge of the Hatch Act*

Secretary Sebelius stated that she knew that the Hatch Act restricts political speech during official events. She was given written materials after her initial ethics briefing in 2009 (which included material on the Hatch Act), received trainings and updates at least once a year that included information about the Hatch Act, and received copies of Hatch Act reminders that HHS sent to employees via email. In addition, through her Chief of Staff, the Secretary received White House memoranda that discussed the Hatch Act. Secretary Sebelius stated that she knew

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at the time of the HRC appearance that when speaking in her official capacity she could not encourage attendees to vote for particular candidates. Subsequent to the HRC speech, the Secretary stated that she sought additional guidance regarding her obligations under the Hatch Act.

### III. ANALYSIS

#### A. *Secretary Sebelius is Subject to the Provisions of the Hatch Act*

The Hatch Act restricts the political activity of "any individual, other than the President and the Vice President, employed or holding office in ... an Executive agency other than the Government Accountability Office." 5 U.S.C. § 7322(1). As Secretary of HHS, an executive department, Secretary Sebelius is subject to the Act's restrictions. See 5 U.S.C. § 101 (identifying HHS as an executive department) and 5 U.S.C. § 105 (defining 'executive agency' as an executive department, government corporation, or independent establishment).

The Hatch Act prohibits federal employees from using their official authority or influence for the purpose of interfering with or affecting the result of an election. 5 U.S.C. § 7323(a)(1). In discussing the 7323(a)(1) prohibition, Senator Carl Hatch explained that official authority is "authority which the person is possessed of by virtue of his office ... power which he would not have were it not for his office." 86 Cong. Rec. 2347 (March 5, 1940) (statement of Sen. Hatch). The attendant Hatch Act regulation gives examples of the type of activity the prohibition encompasses. For example, it is a use of official authority or influence to affect an election when an employee uses her "official title while participating in political activity." 5 C.F.R. § 734.302(b)(1). Political activity is defined in the Hatch Act regulations as "an activity directed toward the success or failure of a political party, candidate for partisan political office, or partisan political group." 5 C.F.R. § 734.101.

#### B. *Secretary Sebelius Violated the Hatch Act When She Gave Her Keynote Speech at the February 25, 2012, HRC Gala*

Secretary Sebelius appeared at the HRC gala in her official capacity as HHS Secretary. As explained above, twice during the speech, Secretary Sebelius diverged from her prepared remarks. First, she endorsed the gubernatorial campaign of North Carolina Lieutenant Governor Walter Dalton and stated that it is "hugely important" to elect a Democratic Governor in North Carolina. Although Secretary Sebelius testified that she "had not intended to endorse him," her words had that effect. Because she made this endorsement in her official capacity as HHS Secretary, she violated the Hatch Act.

In addition, Secretary Sebelius advocated for the reelection of President Obama in a series of extemporaneous remarks. Secretary Sebelius suggested that the effort to defeat Amendment One on the ballot in May could serve as a "great template to do what needs to be done to organize people and turn out people for November." She noted that North Carolina is critical in the next election and emphasized that it is "hugely important to make sure we reelect the

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President." These statements were made in Secretary Sebelius' official capacity and therefore violated the Hatch Act's prohibition against using official authority or influence to affect the results of an election.

#### IV. CONCLUSION

As mentioned in the introduction to this report, an issue distinct from and unrelated to the Secretary's violation of § 7323(a)(1) was whether the U.S. Treasury paid for the costs of her political activity, which would be a violation of 5 U.S.C. § 7324(b). HHS subsequently reclassified the HRC event as political and issued a statement to that effect. It also took appropriate and timely steps to ensure that the government received reimbursement for all travel-related costs and expenses. These efforts have cured any violation of § 7324(b).

Secretary Sebelius also stated that she rescinded her endorsement of Lt. Governor Dalton. As stated, OSC is not aware of any prior or subsequent political comments in an official setting by Secretary Sebelius. Finally, while a violation of the Hatch Act occurred, Secretary Sebelius' statements would have been permissible if they had been made in her personal capacity.

The U.S. Constitution provides the President with authority to appoint officers of the United States, by and with the advice and consent of the Senate. In light of the President's constitutional authority, Congress has determined that violations of the Hatch Act by such officers be referred to the President "for appropriate action." See 5 U.S.C. § 1215(b). Accordingly, OSC hereby submits this Report of Prohibited Political Activity, together with a response from Secretary Sebelius, to the President.

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# EXHIBIT

6

**Wolff, Kate (HHS/OS)**

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**From:** Wolff, Kate (HHS/OS)  
**Sent:** Wednesday, March 28, 2012 1:32 PM  
**To:** 'Grace Strome'; 'Jessica McCall'  
**Subject:** RE: Reimbursement Request for Recent Political Travel

Thank you!

Kate Wolff  
Director, Scheduling and Advance  
Office of the Secretary  
Department of Health and Human Services  
Desk: 202-690-1058  
[kate.wolff@hhs.gov](mailto:kate.wolff@hhs.gov)

**From:** Grace Strome [<mailto:GStrome@barackobama.com>]  
**Sent:** Wednesday, March 28, 2012 10:51 AM  
**To:** Wolff, Kate (HHS/OS); Jessica McCall  
**Subject:** RE: Reimbursement Request for Recent Political Travel

Hi Kate,

Update on the reimbursement: the DNC will be paying for this. Chris Canning is working on getting the check cut today.

Thanks for your patience on this. Let me know if you don't receive the payment soon.

Thanks,  
Grace

**From:** Grace Strome  
**Sent:** Tuesday, March 27, 2012 9:24 AM  
**To:** Wolff, Kate (HHS/OS); Jessica McCall  
**Subject:** RE: Reimbursement Request for Recent Political Travel

Hi Kate,

I'm sorry this has turned into such an ordeal for you and your team!

We are still figuring out things on our end, but one way or another, I'm having our accounting department start processing and cutting the check. So you will have your reimbursement soon!

Thanks and again sorry for the delay!  
Grace

**From:** Grace Strome  
**Sent:** Monday, March 26, 2012 2:33 PM  
**To:** Wolff, Kate (HHS/OS); Jessica McCall; CanningC  
**Subject:** RE: Reimbursement Request for Recent Political Travel

Hi All,

Sorry for the delay in response, we have been slow here because we are trying to determine who should be paying for what.

Just to clarify here...was it the DNC that did the outreach and planned this event? If so the campaign should technically not be paying for it and the DNC should be billed.

Again, sorry this is taking so long, we are just trying to make sure we have all the details straight.

Thanks,  
Grace

From: Wolff, Kate (HHS/OS) [mailto:Kate.Wolff@hhs.gov]  
Sent: Monday, March 26, 2012 1:45 PM  
To: Jessica McCall; CanningC  
Cc: Grace Strome  
Subject: RE: Reimbursement Request for Recent Political Travel

Hi - sorry to nag about this one, but let me know if you have any questions. We haven't seen anything in the mail yet.

Thanks!  
Kate

Kate Wolff  
Director, Scheduling and Advance  
Office of the Secretary  
Department of Health and Human Services  
Desk: 202-690-1058  
[kate.wolff@hhs.gov](mailto:kate.wolff@hhs.gov)

From: Jessica McCall [mailto:JMcCall@barackobama.com]  
Sent: Friday, March 09, 2012 10:40 AM  
To: Wolff, Kate (HHS/OS); CanningC  
Cc: Grace Strome  
Subject: RE: Reimbursement Request for Recent Political Travel

Thanks, Kate!

We'll get this taken care of.

Jess

From: Wolff, Kate (HHS/OS) [mailto:Kate.Wolff@hhs.gov]  
Sent: Friday, March 09, 2012 9:35 AM  
To: CanningC; Jessica McCall  
Subject: Reimbursement Request for Recent Political Travel

Hi Chris and Jessica,

(b)(5) - deliberative process

Please send the requested reimbursement to the Department of Health and Human Services to my attention at 200 Independence Ave., SW, Washington, DC 20201. Please feel free to call me if you have any questions!

**Day 1: Cleveland, OH**

- DC → Cleveland, OH
- Official Event: Women's Roundtable
- Political Event: Fundraiser for Sen. Sherrod Brown
- Cleveland, OH → Columbus, OH

**Day 2: Columbus, OH**

- Official Event: Ohio State University HRSA Grant Event
- Official Event: Ohio State University Clinical Skills and Education Center Tour
- Political Event: OFA Women Leaders Meet and Greet
- Political Event: Fundraiser for Sen. Sherrod Brown
- Columbus, OH → Cincinnati, OH (driving)

**Day 3: Charlotte, NC**

- Cincinnati, OH → Charlotte, NC
- Political Event: DNCC Host Committee Meet and Greet
- Political Event: Remarks at Human Rights Campaign Dinner
- Charlotte, NC → DC

**Total Trip Cost: \$2,361.95**

**Part 1: Hypothetical Trip Formula**

**Hypothetical Travel Costs:**

Day 1: DC → Columbus \$234.80  
Day 2: Columbus → Charlotte → DC + \$419.00  
Total: \$653.80

**Hotel Room Costs:**

Charlotte, NC → Westin Hotel + \$263.89

Meals and incidental Expenditures: + \$56.00

**Total Reimbursement Request,  
Barack Obama Campaign: \$1,003.69**

Thanks,

Kate

Kate Wolff  
Director, Scheduling and Advance  
Office of the Secretary  
Department of Health and Human Services  
Desk: 202-690-1058  
[kate.wolff@hhs.gov](mailto:kate.wolff@hhs.gov)

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# EXHIBIT

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**Wolff, Kate (HHS/OS)**

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**From:** Wolff, Kate (HHS/OS)  
**Sent:** Wednesday, August 08, 2012 4:32 PM  
**To:** 'Chris Canning'  
**Subject:** RE: Request for reimbursement

Yes it came yesterday and should have been deposited today!

**From:** Chris Canning [mailto:CanningC@dnc.org]  
**Sent:** Wednesday, August 08, 2012 4:27 PM  
**To:** Wolff, Kate (HHS/OS)  
**Subject:** RE: Request for reimbursement

Have you seen this check yet?

**From:** Wolff, Kate (HHS/OS) [mailto:Kate.Wolff@hhs.gov]  
**Sent:** Monday, July 23, 2012 12:05 PM  
**To:** Chris Canning  
**Subject:** Request for reimbursement

Hi Chris,

Per additional guidance we have received from our ethics counsel, we are requesting reimbursement for staff travel costs related to Secretary Sebelius's February 25<sup>th</sup> travel to Charlotte, NC.

**Traveler:** AJ Pearlman  
**Date:** February 25, 2012  
**Location:** Charlotte, NC

**Commercial Carrier:** \$1,438.10  
**Mileage:** \$14.28  
**Ground transportation:** \$32.75  
**Reservation fee:** \$19.60  
**TMC fee:** \$6.08  
**Total:** \$1,510.81

Please make the check out to the Department of Health and Human Services, and send it to my attention at 200 Independence Ave., SW, Room 615F, Washington, DC 20009.

Please let me know if you have any questions!  
Kate

Kate Wolff  
Director, Scheduling and Advance  
Office of the Secretary  
Department of Health and Human Services  
Desk: 202-690-1058  
[kate.wolff@hhs.gov](mailto:kate.wolff@hhs.gov)

# EXHIBIT

8

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Democratic National  
Committee

Vendor No: HEAL02

Check No: 49707

April 12, 2012

DEPT OF HEALTH & HUMAN SVCS

Reference	Invoice Date	Invoice Description	Net Amount Paid
041112	04/11/12	Reimbur. for 2 political events by Sen. Seb	1,003.69
Total :			1,003.69

Democratic National Committee  
April Fund  
10 South Capitol Street, S.E.  
Washington, DC 20003

Regional General Fund Acct.

(b)(4)

April 12, 2012

49707

(b)(4)

ONE THOUSAND THREE AND 69/100

Amount: \*\*\*\*\*\$1,003.69

Valid After 90 Days

Pay To The DEPT OF HEALTH & HUMAN SVCS  
Order Of: 200 INDEPENDENCE AVE. S.W.  
WASHINGTON, DC 20201

(b)(4)



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# EXHIBIT

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Image# 12952836802

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**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12FE4M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street, SE

Check if different  
than previously  
reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C

C00010603

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

M M /

D D /

Y Y

in the  
State of

M M

(d) 30-Day  
POST-Election  
Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

M M /

D D /

Y Y

in the  
State of

M M

5. Covering Period

M M /

D D /

Y Y

through

M M /

D D /

Y Y

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

[Electronically Filed]

Date

M M /

D D /

Y Y

**FEC FORM 3X**  
Rev. 12/2004

# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

**II. Disbursements**
**COLUMN A**  
Total This Period

**COLUMN B**  
Calendar Year-to-Date

<b>21. Operating Expenditures:</b>		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share .....	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures .....	5851598.74	23708119.47
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	5851598.74	23708119.47
<b>22. Transfers to Affiliated/Other Party Committees.....</b>	7093877.51	18498795.28
<b>23. Contributions to Federal Candidates/Committees and Other Political Committees.....</b>	0.00	11850.00
<b>24. Independent Expenditures (use Schedule E) .....</b>	0.00	0.00
<b>25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F).....</b>	498000.74	2862002.93
<b>26. Loan Repayments Made.....</b>	1000000.00	4000000.00
<b>27. Loans Made.....</b>	0.00	0.00
<b>28. Refunds of Contributions To:</b>		
(a) Individuals/Persons Other Than Political Committees .....	95598.00	369684.12
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)) .....	95598.00	369684.12
<b>29. Other Disbursements .....</b>	0.00	300.00
<b>30. Federal Election Activity (2 U.S.C. §431(20))</b>		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share .....	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds .....	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)).....	0.00	0.00
<b>31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..</b>	14539074.99	49250751.80
<b>32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....</b>	14539074.99	49250751.80

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**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**Use separate schedule(s)  
for each category of the  
Detailed Summary PageFOR LINE NUMBER:  
(check only one)

PAGE 2860 OF 3152

☒ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26  
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 28 ☐ 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

DNC Services Corp./Dem. Nat'l Committee

Full Name (Last, First, Middle Initial)

**A. CONNECTICUT SECRETARY OF STATE**

Mailing Address P.O. BOX 150470

City  
HartfordState  
CTZip Code  
06115Purpose of Disbursement  
Voter File Updates and Maintenance

Candidate Name

Category/  
Type

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State:

District:

Date of Disbursement

 04 /  12 /  2012

Transaction ID : SB21B-248587

Amount of Each Disbursement this Period

 300.00

Full Name (Last, First, Middle Initial)

**B. FULL CIRCLE WIRELESS, INC.**

Mailing Address 8000 Research Drive

City  
IrvineState  
CAZip Code  
92618Purpose of Disbursement  
Cellular / Mobile

Candidate Name

Category/  
Type

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State:

District:

Date of Disbursement

 04 /  12 /  2012

Transaction ID : SB21B-248588

Amount of Each Disbursement this Period

 6000.00

Full Name (Last, First, Middle Initial)

**C. DEPT OF HEALTH & HUMAN SVCS**

Mailing Address 200 INDEPENDENCE AVE. S.W.

City  
WASHINGTONState  
DCZip Code  
20201Purpose of Disbursement  
Travel

Candidate Name

Category/  
Type

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State:

District:

Date of Disbursement

 04 /  12 /  2012

Transaction ID : SB21B-248589

Amount of Each Disbursement this Period

 1003.00

SUBTOTAL of Disbursements This Page (optional) -----▶

7303.00

TOTAL This Period (last page this line number only) -----▶

# EXHIBIT

10

Image# 12951806642

**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12F84M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street, SE

Check if different  
than previously  
reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C

C00010803

3. IS THIS  
REPORT☒ NEW  
(N)

OR

☐ AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

- ☐ April 15  
Quarterly Report (Q1)
- ☐ July 15  
Quarterly Report (Q2)
- ☐ October 15  
Quarterly Report (Q3)
- ☐ January 31  
Year-End Report (YE)
- ☐ July 31 Post-Year  
Report (Non-election  
Year Only) (MY)
- ☐ Termination Report  
(TER)

(b) Monthly  
Report  
Due On:

- ☐ Feb 20 (M2) ☒ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11)  
(Non-Election  
Year Only)
- ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12)  
(Non-Election  
Year Only)
- ☐ Apr 30 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
- ☐ Convention (12C) ☐ Special (12S)

Election on

/ /

In the  
State of

/ /

(d) 30-Day  
POST-Election  
Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

/ /

In the  
State of

/ /

5. Covering Period

04

01

2012

through

04

30

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

(Electronically Filed)

Date

05

20

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
Only**FEC FORM 3X**  
Rev. 12/2004

FEBAND09

14044353171

# **DETAILED SUMMARY PAGE of Disbursements**

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share .....	0.00	0.00
(ii) Non-Federal Share .....	0.00	0.00
(b) Other Federal Operating Expenditures .....	5851508.74	23705795.50
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	5851508.74	23705795.50
22. Transfers to Affiliated/Other Party Committees .....	7083877.51	18408795.28
23. Contributions to Federal Candidates/Committees and Other Political Committees .....	0.00	11850.00
24. Independent Expenditures (use Schedule E) .....	0.00	0.00
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F) .....	498000.74	2062002.83
26. Loan Repayments Made .....	1000000.00	4000000.00
27. Loans Made .....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees .....	95568.00	309084.12
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees (such as PACs) .....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)) .....	95568.00	309084.12
29. Other Disbursements .....	0.00	300.00
30. Federal Election Activity (2 U.S.C. §461(20))		
(a) Allocated Federal Election Activity (from Schedule H8)		
(i) Federal Share .....	0.00	0.00
(ii) "Levin" Share .....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds .....	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) .....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) .....	14538074.00	49248427.83
32. Total Federal Disbursements (subtract Line 21(a)(i) and Line 30(a)(i) from Line 31) .....	14538074.00	49248427.83

# EXHIBIT

11



14044353174

**Wolff, Kate (HHS/OS)**

---

**From:** Chris Canning [CanningC@dnc.org]  
**Sent:** Monday, July 23, 2012 12:12 PM  
**To:** Wolff, Kate (HHS/OS)  
**Subject:** RE: Request for reimbursement

On it. Thanks.

**From:** Wolff, Kate (HHS/OS) [mailto:Kate.Wolff@hhs.gov]  
**Sent:** Monday, July 23, 2012 12:05 PM  
**To:** Chris Canning  
**Subject:** Request for reimbursement

Hi Chris,

Per additional guidance we have received from our ethics counsel, we are requesting reimbursement for staff travel costs related to Secretary Sebelius's February 25<sup>th</sup> travel to Charlotte, NC.

**Traveler:** AJ Pearman  
**Date:** February 25, 2012  
**Location:** Charlotte, NC

**Commercial Carrier:** \$1,438.10  
**Mileage:** \$14.28  
**Ground transportation:** \$32.75  
**Reservation fee:** \$19.60  
**TMC fee:** \$6.08  
**Total:** \$1,510.81

Please make the check out to the Department of Health and Human Services, and send it to my attention at 200 Independence Ave., SW, Room 615F, Washington, DC 20009.

Please let me know if you have any questions!  
Kate

Kate Wolff  
Director, Scheduling and Advance  
Office of the Secretary  
Department of Health and Human Services  
Desk: 202-690-1058  
[kate.wolff@hhs.gov](mailto:kate.wolff@hhs.gov)

# EXHIBIT

12

Image# 12962146234

PAGE 1 / 3674

**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12FE4M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street, SE

Check if different  
than previously  
reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00010603

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)

4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

In the  
State of(d) 30-Day  
POST-Election  
Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

In the  
State of

5. Covering Period

08

01

2012

through

08

31

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

[Electronically Filed]

Date

12

04

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
Only**FEC FORM 3X**  
Rev. 12/2004

# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

**II. Disbursements**
**COLUMN A**  
Total This Period

**COLUMN B**  
Calendar Year-to-Date

21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share .....	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures .....	6106491.83	47979127.48
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	6106491.83	47979127.48
22. Transfers to Affiliated/Other Party Committee.....	15103872.27	60667208.83
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	50000.00	63750.00
24. Independent Expenditures (use Schedule E) .....	0.00	0.00
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F).....	640284.38	17255008.85
26. Loan Repayments Made.....	0.00	4000000.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees .....	34784.25	543465.38
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	34784.25	543465.38
29. Other Disbursements .....	0.00	1800.00
30. Federal Election Activity (2 U.S.C. §431(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share .....	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds .....	0.00	0.00
(c) Total Federal Election Activity (add .. Lines 30(a)(i), 30(a)(ii) and 30(b))....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	21935432.73	130510358.54
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	21935432.73	130510358.54

14044353177

**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

 FOR LINE NUMBER:  
 (check only one)

PAGE 3027 OF 3574

☒ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26  
☐ 27 ☐ 28a ☐ 28b ☐ 29c ☐ 29 ☐ 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

DNC Services Corp./Dem. Natl Committee

Full Name (Last, First, Middle Initial)

**A. DEPARTMENT OF HEALTH AND HUMAN SERVICES**

Mailing Address 200 INDEPENDENCE AVE NW RM-815F

 City State Zip Code  
 Dept How Offs At H DC 20201

 Purpose of Disbursement  
 Travel

Candidate Name

 Category/  
 Type

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Date of Disbursement

08 / 02 / 2012

Transaction ID : SB21B-253691

Amount of Each Disbursement This Period

1510.81

Full Name (Last, First, Middle Initial)

**B. Amanda Howe**

Mailing Address 304 Prince St

 City State Zip Code  
 Alexandria VA 22314

 Purpose of Disbursement  
 Travel

Candidate Name

 Category/  
 Type

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Date of Disbursement

08 / 02 / 2012

Transaction ID : SB21B-253692

Amount of Each Disbursement This Period

236.53

Full Name (Last, First, Middle Initial)

**C. Amanda Howe**

Mailing Address 304 Prince St

 City State Zip Code  
 Alexandria VA 22314

 Purpose of Disbursement  
 Cellular / Mobile

Candidate Name

 Category/  
 Type

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Date of Disbursement

08 / 02 / 2012

Transaction ID : SB21B-253693

Amount of Each Disbursement This Period

220.02

SUBTOTAL of Disbursements This Page (optional).....▶

1077.26

TOTAL This Period (last page this line number only).....▶

# EXHIBIT

13

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (In full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12PR4M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street SE

Check if different  
than previously  
reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C 00010803

3. IS THIS  
REPORT☐ NEW  
(N) OR☒ AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

- ☐ April 15  
Quarterly Report (Q1)
- ☐ July 15  
Quarterly Report (Q2)
- ☐ October 15  
Quarterly Report (Q3)
- ☐ January 31  
Year-End Report (YE)
- ☐ July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)
- ☐ Termination Report  
(TER)

(b) Monthly  
Report  
Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11)  
(Non-Election Year Only)
- ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☒ Sep 20 (M9) ☐ Dec 20 (M12)  
(Non-Election Year Only)
- ☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
- ☐ Convention (12C) ☐ Special (12S)

Election on

In the  
State of(d) 30-Day  
POST-Election  
Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

In the  
State of

5. Covering Period

08

01

2012

through

08

31

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

[Electronically Filed]

Date

12

04

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
OnlyFEC FORM 3X  
Rev. 12/2004

# **DETAILED SUMMARY PAGE of Disbursements**

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share .....	0.00	0.00
(ii) Non-Federal Share .....	0.00	0.00
(b) Other Federal Operating Expenditures .....	8100491.83	47979127.48
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	8100491.83	47979127.48
22. Transfers to Affiliated/Other Party Committees .....	15103572.27	60667208.83
23. Contributions to Federal Candidates/Committees and Other Political Committees .....	50000.00	63750.00
24. Independent Expenditures (use Schedule E) .....	0.00	0.00
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F) .....	640284.38	17250006.95
26. Loan Repayments Made .....	0.00	4000000.00
27. Loans Made .....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees .....	34784.25	543485.38
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees (such as PACs) .....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)) .....	34784.25	543485.38
29. Other Disbursements .....	0.00	1800.00
30. Federal Election Activity (2 U.S.C. §13120)		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share .....	0.00	0.00
(ii) "Levin" Share .....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds .....	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) .....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) .....	21935432.73	130510358.54
32. Total Federal Disbursements (subtract Line 21(a)(i) and Line 30(a)(i) from Line 31) .....	21935432.73	130510358.54



# EXHIBIT

14

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than the Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (In full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12FE4M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street, SE

Check if different  
than previously  
reported. (ACC)

Washington

DC

20003

2. REC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲



C00010603

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)

Dec 20 (M12)  
(Post-Election  
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

In the  
State of(d) 30-Day  
POST-Election  
Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

In the  
State of

5. Covering Period

02

01

2012

through

02

29

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

[Electronically Filed]

Date

06

27

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
OnlyFEC FORM 3X  
Rev. 12/2004

Image# 12952244393

**SCHEDULE D (FEC Form 3X)**

**DEBTS AND OBLIGATIONS**

**Excluding Loans**

(Use separate  
schedule(s)  
for each  
numbered line)

PAGE 2258 OF 2268

FOR LINE NUMBER:  
(check only one)

☐ 9  
☒ 10

NAME OF COMMITTEE (in full)  
DNC Services Corp./Dem. Natl Committee

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor  
**CREATIVE PRINT GROUP, INC.**

Nature of Debt (Purpose):  
Design/Printing

Mailing Address 1580 CATON CENTER DRIVE

City State Zip Code  
BALTIMORE MD 21227

Outstanding Balance Beginning This Period

414747.04

Transaction ID: SD-5083

Amount Incurred This Period

181802.95

Payment This Period

143905.37

Outstanding Balance at Close of This Period

452834.62

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor  
**DCM**

Nature of Debt (Purpose):  
Telemarketing Services

Mailing Address 45 Main Street  
Suite 810

City State Zip Code  
Brooklyn NY 11201

Outstanding Balance Beginning This Period

91133.00

Transaction ID: SD-5084

Amount Incurred This Period

39320.15

Payment This Period

10439.95

Outstanding Balance at Close of This Period

114013.20

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor  
**DEMOCRATIC PROPERTIES CORP. FEDERAL ACCOUNT**

Nature of Debt (Purpose):

Mailing Address 430 SOUTH CAPITOL ST SE

City State Zip Code  
WASHINGTON DC 20003

Outstanding Balance Beginning This Period

108408.27

Transaction ID: SD-5085

Amount Incurred This Period

120834.45

Payment This Period

12366.18

Outstanding Balance at Close of This Period

216936.54

1) SUBTOTALS This Period This Page (optional).....>

783784.58

2) TOTALS This Period (last page this line number only).....>

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....>

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only).....>

14044353184

**SCHEDULE D (FEC Form 3X)****DEBTS AND OBLIGATIONS**

Excluding Loans

(Use separate  
schedule(s)  
for each  
numbered line)

PAGE 2250 OF 2288

FOR LINE NUMBER:  
(check only one)☐ 8  
☒ 10

NAME OF COMMITTEE (in Full)

DNC Services Corp./Dem. Natl Committee

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor  
**GORDON AND SCHWENKMEYER, INC**Nature of Debt (Purpose):  
Telemarketing Services

Mailing Address 300 N. Sepulveda Blvd., #1026

City State Zip Code  
EL SEGUNDO CA 90245

Outstanding Balance Beginning This Period

367551.14

Transaction ID : SD-5086

Amount Incurred This Period

121293.55

Payment This Period

123430.53

Outstanding Balance at Close of This Period

365408.00

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor  
**GRAYHAIR SOFTWARE, INC.**Nature of Debt (Purpose):  
Direct Mail

Mailing Address 124 GATHER DRIVE, STE. 100

City State Zip Code  
Mount Laurel NJ 08054

Outstanding Balance Beginning This Period

1177.40

Transaction ID : SD-5087

Amount Incurred This Period

799.29

Payment This Period

0.00

Outstanding Balance at Close of This Period

1976.75

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor  
**INFOGROUP**Nature of Debt (Purpose):  
Direct Mail

Mailing Address PO BOX 3243

City State Zip Code  
OMAHA NE 68103

Outstanding Balance Beginning This Period

34400.62

Transaction ID : SD-5088

Amount Incurred This Period

33915.90

Payment This Period

1800.13

Outstanding Balance at Close of This Period

66328.39

- 1) SUBTOTALS This Period This Page (optional) ----- ➤
- 2) TOTALS This Period (last page this line number only) ----- ➤
- 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) ----- ➤
- 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) ➤

433711.20

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (In full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12FE4M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street, SE

Check if different  
than previously  
reported. (AC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C

C00010003

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

In the  
State of(d) 30-Day  
POST-Election  
Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

In the  
State of

5. Covering Period

03

01

2012

through

03

31

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

[Electronically Filed]

Date

07

30

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
OnlyFEC FORM 3X  
Rev. 12/2004

Image# 12952842859

**SCHEDULE D (FEC Form 3X)**  
**DEBTS AND OBLIGATIONS**  
**Excluding Loans**

(Use separate  
 schedule(s)  
 for each  
 numbered line)

PAGE 2593 OF 2600

FOR LINE NUMBER:  
 (check only one)

☐ 8  
☒ 10

NAME OF COMMITTEE (In Full)  
 DNC Services Corp./Dem. Nat'l Committee

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor  
 DCM

Nature of Debt (Purpose):  
 Telemarketing Services

Mailing Address 45 Main Street  
 Suite 818

City State Zip Code  
 Brooklyn NY 11201

Outstanding Balance Beginning This Period  
 114013.20

Transaction ID : SD-5168

Amount Incurred This Period  
 2686.90

Payment This Period

1675.85

Outstanding Balance at Close of This Period  
 115024.25

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor  
 DEMOCRATIC PROPERTIES CORP. FEDERAL ACCOUNT

Nature of Debt (Purpose):

Mailing Address 430 SOUTH CAPITOL ST SE

City State Zip Code  
 WASHINGTON DC 20003

Outstanding Balance Beginning This Period  
 218038.54

Transaction ID : SD-5169

Amount Incurred This Period  
 11961.35

Payment This Period

331587.90

Outstanding Balance at Close of This Period  
 0.00

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor  
 GORDON AND SCHWENKMEYER, INC

Nature of Debt (Purpose):  
 Telemarketing Services

Mailing Address 300 N. Sepulveda Blvd., #1055

City State Zip Code  
 EL SEGUNDO CA 90245

Outstanding Balance Beginning This Period  
 305408.08

Transaction ID : SD-5170

Amount Incurred This Period  
 83501.00

Payment This Period

76808.82

Outstanding Balance at Close of This Period  
 352001.04

1) SUBTOTALS This Period This Page (optional) >

467025.29

2) TOTALS This Period (last page this line number only) >

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) >

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) >

14044353187

14044353188

Image# 12951806542

05/18/2012 16:13

PAGE 1 / 3152

**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (In full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines

12FB4M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street, SE

Check if different  
than previously  
reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C

C00010003

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

In the  
State of(d) 30-Day  
POST-Election  
Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

In the  
State of

5. Covering Period

04

01

2012

through

04

30

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

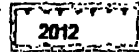
Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

[Electronically Filed]

Date



NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
Only**FEC FORM 3X**  
Rev. 12/2004

FEBAND06

Image# 12951805782

**SCHEDULE D (FEC Form 3X)**

**DEBTS AND OBLIGATIONS**

Excluding Loans

(Use separate  
schedule(s)  
for each  
numbered line)

PAGE 3141 OF 3152

FOR LINE NUMBER:  
(check only one)

☐ 8  
☒ 10

NAME OF COMMITTEE (in Full)

DNC Services Corp./Dem. Natl Committee

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

DCM

Nature of Debt (Purpose):  
Telemarketing Services

Mailing Address 45 Main Street  
Suite 818

City State Zip Code  
Brooklyn NY 11201

Outstanding Balance Beginning This Period

110024.25

Transaction ID : SD-S204

Amount Incurred This Period

80205.95

Payment This Period

73017.20

Outstanding Balance at Close of This Period

102213.00

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

GROSSMAN MARKETING GROUP

Nature of Debt (Purpose):  
Direct Mail

Mailing Address P.O. BOX 9184

City State Zip Code  
CHELSEA MA 02150-9184

Outstanding Balance Beginning This Period

0.00

Transaction ID : SD-S205

Amount Incurred This Period

38718.82

Payment This Period

931.80

Outstanding Balance at Close of This Period

37788.22

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

GORDON AND SCHWENKMAYER, INC

Nature of Debt (Purpose):  
Telemarketing Services

Mailing Address 300 N. Sepulveda Blvd., #1055

City State Zip Code  
EL SEGUNDO CA 90245

Outstanding Balance Beginning This Period

362091.04

Transaction ID : SD-S206

Amount Incurred This Period

53265.25

Payment This Period

187205.59

Outstanding Balance at Close of This Period

238060.70

1) SUBTOTALS This Period This Page (optional) >

378050.92

2) TOTALS This Period (last page this line number only) >

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) >

0.00

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) >

0.00

14044353189



FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than the Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (In full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12FB4M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street, SE

Check if different  
than previously  
reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C

C00010803

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

In the  
State of(d) 30-Day  
POST-Election  
Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

In the  
State of

6. Covering Period

05

01

2012

through

05

31

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

[Electronically Filed]

Date

07

30

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
OnlyFEC FORM 3X  
Rev. 12/2004

**SCHEDULE D (FEC Form 3X)****DEBTS AND OBLIGATIONS****Excluding Loans**(Use separate  
schedule(s)  
for each  
numbered line)

PAGE 3334 OF 3344

FOR LINE NUMBER:  
(check only one)☐ 9  
☒ 10

NAME OF COMMITTEE (In Full)

DNC Services Corp./Dem. Natl Committee

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

DAVID BINDER RESEARCH

Nature of Debt (Purpose):  
Polling Expenses

Mailing Address 44 PAGE STREET, SUITE 404

City State

SAN FRANCISCO

Zip Code

CA

94102

Outstanding Balance Beginning This Period

0.00

Transaction ID: SD-5242

Amount Incurred This Period

134400.00

Payment This Period

89800.00

Outstanding Balance at Close of This Period

44600.00

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

DCM

Nature of Debt (Purpose):  
Telemarketing Services

Mailing Address 45 Main Street

Suite 818

City State

Brooklyn

Zip Code

NY

11201

Outstanding Balance Beginning This Period

102213.00

Transaction ID: SD-5243

Amount Incurred This Period

28850.20

Payment This Period

43073.50

Outstanding Balance at Close of This Period

87889.70

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

DEMOCRATIC PROPERTIES CORP. FEDERAL ACCOUNT

Nature of Debt (Purpose):

Mailing Address 430 SOUTH CAPITOL ST SE

City State

WASHINGTON

Zip Code

DC

20003

Outstanding Balance Beginning This Period

0.00

Transaction ID: SD-3244

Amount Incurred This Period

228302.72

Payment This Period

114651.36

Outstanding Balance at Close of This Period

114651.36

1) SUBTOTALS This Period This Page (optional) \_\_\_\_\_ ▶

244241.00

2) TOTALS This Period (last page this line number only) \_\_\_\_\_ ▶

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) \_\_\_\_\_ ▶

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) \_\_\_\_\_ ▶

**SCHEDULE D (FEC Form 3X)****DEBTS AND OBLIGATIONS**

Excluding Loans

(Use separate  
schedule(s)  
for each  
numbered line)

PAGE 3335 OF 3344

FOR LINE NUMBER:  
(check only one)☐ 8  
☒ 10

NAME OF COMMITTEE (In Full)

DNC Services Corp./Dem. Natl Committee

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

GROSSMAN MARKETING GROUP

Nature of Debt (Purpose):  
Direct Mail

Mailing Address P.O. Box 9184

City State

Zip Code

CHELSEA

MA

02150-0184

Outstanding Balance Beginning This Period

37788.22

Transaction ID : SD-S245

Amount Incurred This Period

0.00

Payment This Period

0.00

Outstanding Balance at Close of This Period

37788.22

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

GORDON AND SCHWENKMEYER, INC

Nature of Debt (Purpose):  
Telemarketing Services

Mailing Address 300 N Sepulveda Blvd., #1055

City State

Zip Code

EL SEGUNDO

CA

90245

Outstanding Balance Beginning This Period

238000.70

Transaction ID : SD-S246

Amount Incurred This Period

15902.13

Payment This Period

200830.04

Outstanding Balance at Close of This Period

25113.80

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

GRAYHAIR SOFTWARE, INC.

Nature of Debt (Purpose):  
Direct Mail

Mailing Address 124 GAITHER DRIVE, STE 100

City State

Zip Code

Mount Laurel

NJ

08054

Outstanding Balance Beginning This Period

1588.51

Transaction ID : SD-S247

Amount Incurred This Period

911.51

Payment This Period

1588.51

Outstanding Balance at Close of This Period

911.51

1) SUBTOTALS This Period This Page (optional) &gt;

91811.42

2) TOTALS This Period (last page this line number only) &gt;

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) &gt;

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) &gt;

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (In full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12FB4M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street SE

Check if different  
than previously  
reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C

C00010003

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

In the  
State of(d) 30-Day  
POST-Election  
Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

In the  
State of

5. Covering Period

00

01

2012

through

06

30

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

[Electronically Filed]

Date

07

30

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
OnlyFEC FORM 3X  
Rev. 12/2004

**SCHEDULE D (FEC Form 3X)****DEBTS AND OBLIGATIONS**

Excluding Loans

(Use separate  
schedule(s)  
for each  
numbered line)

PAGE 5043 OF 5057

FOR LINE NUMBER:  
(check only one)☐ 9  
☒ 10

NAME OF COMMITTEE (In Full)

DNC Services Corp./Dem. Nat'l Committee

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

DELL MARKETING L.P.

Nature of Debt (Purpose):  
Computer EquipmentMailing Address C/O DELL USA L.P.  
PO BOX 643581City State Zip Code  
PITTSBURGH PA 15204-3581

Outstanding Balance Beginning This Period

0.00

Transaction ID : SD-5285

Amount Incurred This Period

5280.22

Payment This Period

0.00

Outstanding Balance at Close of This Period

5280.22

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

DEMOCRATIC PROPERTIES CORP. FEDERAL ACCOUNT

Nature of Debt (Purpose):

Mailing Address 430 SOUTH CAPITOL ST SE

City State Zip Code  
WASHINGTON DC 20003

Outstanding Balance Beginning This Period

114851.38

Transaction ID : SD-5286

Amount Incurred This Period

0.00

Payment This Period

0.00

Outstanding Balance at Close of This Period

114851.38

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

FACTIVA INC. DOW JONES &amp; CO.

Nature of Debt (Purpose):  
Data Services Subscription

Mailing Address PO BOX 30004

City State Zip Code  
NEW YORK NY 10087-0004

Outstanding Balance Beginning This Period

0.00

Transaction ID : SD-5287

Amount Incurred This Period

1214.73

Payment This Period

0.00

Outstanding Balance at Close of This Period

1214.73

1) SUBTOTALS This Period This Page (optional) &gt;

121158.31

2) TOTALS This Period (last page this line number only) &gt;

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) &gt;

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) &gt;

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than the Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12FB4M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street, SE

Check if different  
than previously  
reported. (AO)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C 00010003

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

- ☐ April 15  
Quarterly Report (Q1)
- ☐ July 15  
Quarterly Report (Q2)
- ☐ October 15  
Quarterly Report (Q3)
- ☐ January 31  
Year-End Report (YE)
- ☐ July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)
- ☐ Termination Report  
(TER)

(b) Monthly  
Report  
Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☒ Aug 20 (M8) ☐ Nov 20 (M11)  
(Non-Election  
Year Only)
- ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12)  
(Non-Election  
Year Only)
- ☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
- ☐ Convention (12C) ☐ Special (12S)

Election on

In the  
State of(d) 30-Day  
POST-Election  
Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

In the  
State of

5. Covering Period

07

01

2012

through

07

31

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

[Electronically Filed]

Date

12

04

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
OnlyFEC FORM 3X  
Rev. 12/2004

Image# 12340845168

**SCHEDULE D (FEC Form 3X)**

**DEBTS AND OBLIGATIONS**

Excluding Loans

(Use separate  
schedule(s)  
for each  
numbered line)

PAGE 4558 OF 4575

FOR LINE NUMBER:  
(check only one)

☐ 9  
☒ 10

NAME OF COMMITTEE (in Full)

DNC Services Corp./Dem. Natl Committee

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

DEMOCRATIC PROPERTIES CORP. FEDERAL ACCOUNT

Nature of Debt (Purpose):  
Rent

Mailing Address 430 SOUTH CAPITOL ST SE

City State

Zip Code

WASHINGTON

DC

20003

Outstanding Balance Beginning This Period

114651.36

Transaction ID : SD-5392

Amount Incurred This Period

228302.72

Payment This Period

127017.54

Outstanding Balance at Close of This Period

210036.54

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

FACTIVA INC. DOW JONES & CO.

Nature of Debt (Purpose):  
Data Services Subscription

Mailing Address PO BOX 38094

City State

Zip Code

NEW YORK

NY

10087-0894

Outstanding Balance Beginning This Period

1214.73

Transaction ID : SD-5393

Amount Incurred This Period

1214.73

Payment This Period

2428.46

Outstanding Balance at Close of This Period

0.00

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

THE FELDMAN GROUP, INC

Nature of Debt (Purpose):  
Polling Expenses

Mailing Address 508-510 8TH STREET SE

City State

Zip Code

WASHINGTON

DC

20003

Outstanding Balance Beginning This Period

85654.00

Transaction ID : SD-5394

Amount Incurred This Period

35934.00

Payment This Period

121586.00

Outstanding Balance at Close of This Period

0.00

1) SUBTOTALS This Period This Page (optional).....▶

210036.54

2) TOTALS This Period (last page this line number only).....▶

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....▶

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)▶

14044353196

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (In full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12PB4M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street, SE

Check if different  
than previously  
reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲



C00010803

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)



General (12G)



Runoff (12R)

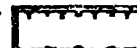


Convention (12C)



Special (12S)

Election on

In the  
State of(d) 30-Day  
POST-Election  
Report for the:

General (30G)

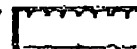


Runoff (30R)



Special (30S)

Election on

In the  
State of

5. Covering Period

08

01

2012

through

08

31

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

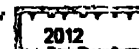
Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

[Electronically Filed]

Date



NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
OnlyFEC FORM 3X  
Rev. 12/2004

FEBMAR2012

14044353197



Image# 12952149894

**SCHEDULE D (FEC Form 3X)**

**DEBTS AND OBLIGATIONS**

Excluding Loans

(Use separate  
schedule(s)  
for each  
numbered line)

PAGE 3661 OF 3674

FOR LINE NUMBER:  
(check only one)

☐ 8  
☒ 10

NAME OF COMMITTEE (In Full)

DNC Services Corp./Dem. Nat'l Committee

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor  
**DCM**

Nature of Debt (Purpose):  
Telemarketing Services

Mailing Address 45 Main Street  
Suite 810

City State Zip Code  
Brooklyn NY 11201

Outstanding Balance Beginning This Period

72815.55

Transaction ID : SD-5450

Amount Incurred This Period

-55.40

Payment This Period

25804.80

Outstanding Balance at Close of This Period

46965.35

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

**DEMOCRATIC PROPERTIES CORP. FEDERAL ACCOUNT**

Nature of Debt (Purpose):  
Rent

Mailing Address 430 SOUTH CAPITOL ST SE

City State Zip Code  
WASHINGTON DC 20003

Outstanding Balance Beginning This Period

216936.54

Transaction ID : SD-5451

Amount Incurred This Period

114851.36

Payment This Period

223119.83

Outstanding Balance at Close of This Period

108468.27

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

**GROSSMAN MARKETING GROUP**

Nature of Debt (Purpose):  
Direct Mail

Mailing Address P.O. BOX 0184

City State Zip Code  
CHELSEA MA 02150-0184

Outstanding Balance Beginning This Period

16333.48

Transaction ID : SD-5452

Amount Incurred This Period

17425.71

Payment This Period

33758.19

Outstanding Balance at Close of This Period

0.00

1) SUBTOTALS This Period This Page (optional) \_\_\_\_\_ ▶

155433.62

2) TOTALS This Period (last page this line number only) \_\_\_\_\_ ▶

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) \_\_\_\_\_ ▶

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) ▶

14044353198

# EXHIBIT

15

# FEC FORM 3X

## REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) TYPE OR PRINT ▼

Example: If typing, type over the lines.

12FE4M5

DNC Services Corp./Dem. Nat'l Committee

ADDRESS (number and street)

430 South Capitol Street, SE



Check if different than previously reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00010603

3. IS THIS REPORT



NEW (N)

OR



AMENDED (A)

4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

- ☐ April 15 Quarterly Report (Q1)
- ☐ July 15 Quarterly Report (Q2)
- ☐ October 15 Quarterly Report (Q3)
- ☐ January 31 Year-End Report (YE)
- ☐ July 31 Mid-Year Report (Non-election Year Only) (MY)
- ☐ Termination Report (TER)

(b) Monthly Report Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11) (Non-Election Year Only)
- ☒ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12) (Non-Election Year Only)
- ☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
- ☐ Convention (12C) ☐ Special (12B)

Election on

in the State of

(d) 30-Day POST-Election Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

in the State of

5. Covering Period

02

01

2012

through

02

29

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Andrew Tobias

Signature of Treasurer

Andrew Tobias

[Electronically Filed]

Date

06

27

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
OnlyFEC FORM 3X  
Rev. 12/2004

**SCHEDULE A (FEC Form 3X)**  
**ITEMIZED RECEIPTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

 FOR LINE NUMBER: PAGE 208 OF 2288  
 (check only one)

☒ 11a ☐ 11b ☐ 11c ☐ 12  
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

**DNC Services Corp./Dem. Natl Committee**

 Full Name (Last, First, Middle Initial)  
**A. Robert W Denton**

Mailing Address 2452 Lavender Dr

 City State Zip Code  
 Walnut Creek CA 94596-0412

 FEC ID number of contributing  
 federal political committee.

**C**

Name of Employer

Information Requested

Occupation

Real Estate Appraiser

Receipt For:

☐ Primary ☐ General  
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

**212.00**

Date of Receipt

**02 / 27 / 2012**

Transaction ID: C26895607

Amount of Each Receipt this Period

**112.00**

 Full Name (Last, First, Middle Initial)  
**B. DANIEL DERDULA**

Mailing Address 5276 Bennett Valley Rd.

 City State Zip Code  
 Santa Rosa CA 95404

 FEC ID number of contributing  
 federal political committee.

**C**

Name of Employer

self

Occupation

Designer

Receipt For:

☐ Primary ☐ General  
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

**500.00**

Date of Receipt

**02 / 21 / 2012**

Transaction ID: C26864747

Amount of Each Receipt this Period

**500.00**

 Full Name (Last, First, Middle Initial)  
**C. Johanna S. Destefano**

Mailing Address 3511 Rue De Fleur

 City State Zip Code  
 Columbus OH 43221-1547

 FEC ID number of contributing  
 federal political committee.

**C**

Name of Employer

Retired

Occupation

Retired

Receipt For:

☐ Primary ☐ General  
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

**1000.00**

Date of Receipt

**02 / 27 / 2012**

Transaction ID: C26894188

Amount of Each Receipt this Period

**1000.00**

SUBTOTAL of Receipts This Page (optional)

**1612.00**

TOTAL This Period (last page this line number only)

**1612.00**